



United States Attorney  
Eastern District of New York

AB:MT:sw  
F.#2009R00195

271 Cadman Plaza East  
Brooklyn, New York 11201

July 27, 2010

Via ECF

All Defense Counsel

Re: United States v. James Bombino, et al.  
Criminal Docket No. 10-147 (SLT)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following supplemental discovery with respect to the above-captioned case.

The items described below are located at First Choice Copy. You may obtain these items by contacting Joe Meisner at (718) 381-1480 x212, or [jmeisner@nyc.rr.com](mailto:jmeisner@nyc.rr.com). Please reference print order number **26181**.

**A. TITLE III EVIDENCE**

Prior to the defendants' arrest, the government conducted court-ordered wiretaps on telephone numbers (617) 719-8443, (617) 645-2213, (781) 664-3108, and (501) 690-3677. The government also conducted court-ordered electronic surveillances of Ralph F. Deleo, and a Starbucks and Dunkin' Donuts store, each of which were located within the District of Massachusetts.

DX #	Description	Bates Range
13	Affidavit and related documents in Support of an Order Authorizing the Interception of Wire Communications Occurring to and from Mobile Telephone Number (617) 719-8443, Bearing ESN A1000000194102, dated 1/9/09	11902-11994
14	Affidavit and related documents in Support of an Order Authorizing the Continued Interception of Wire Communications Occurring to and from Mobile Telephone Number (617) 719-8443, Bearing ESN A1000000194102, dated 2/10/09	11995-12076

DX #	Description	Bates Range
15	Affidavit and related documents in Support of an Order Authorizing the Continued Interception of Wire Communications Occurring to and from Mobile Telephone Number (617) 719-8443, Bearing ESN A1000000194102, dated 3/11/09	12077-12163
16	Affidavits and related documents in Support of Orders Authorizing (1) the Continued Interception of Wire Communications Occurring to and from Mobile Telephone Number (617) 719-8443, Bearing ESN A1000000194102; and (2) the Interception of Oral Communications Occurring inside a Starbucks Store located in Somerville, Massachusetts, dated 4/9/09	12164-12314
17	Affidavits and related documents in Support of Orders Authorizing (1) the Continued Interception of Wire Communications Occurring to and from Mobile Telephone Number (617) 719-8443, Bearing ESN A1000000194102; and (2) the Continued Interception of Oral Communications Occurring inside a Starbucks Store located in Somerville, Massachusetts, dated 5/18/09	12315-12486
18	Affidavits and related documents in Support of Orders Authorizing (1) the Continued Interception of Wire Communications Occurring to and from Mobile Telephone Number (617) 719-8443, Bearing ESN A1000000194102; (2) the Continued Interception of Oral Communications Occurring inside a Starbucks Store located in Somerville, Massachusetts; (3) the Interception of Wire Communications Occurring to and from Mobile Telephone Number (781) 664-3108, Bearing ESN 01502623389; (4) the Interception of Wire Communications Occurring to and from Mobile Telephone Number (617) 645-2213, Bearing ESN 031-1102-6660; and (5) the Interception of Oral Communications Occurring inside a Dunkin' Donuts Store located in Medford, Massachusetts, dated 6/29/09	12487-12687

DX #	Description	Bates Range
19	<p>Affidavits and related documents in Support of Orders Authorizing (1) the Continued Interception of Wire Communications Occurring to and from Mobile Telephone Number (617) 719-8443, Bearing ESN A1000000194102; (2) the Continued Interception of Oral Communications Occurring inside a Starbucks Store located in Somerville, Massachusetts; (3) the Continued Interception of Wire Communications Occurring to and from Mobile Telephone Number (781) 664-3108, Bearing ESN 01502623389; (4) the Continued Interception of Wire Communications Occurring to and from Mobile Telephone Number (617) 645-2213, Bearing ESN 031-1102-6660; and (5) the Continued Interception of Oral Communications Occurring inside a Dunkin' Donuts Store located in Medford, Massachusetts, dated 7/29/09</p>	12688-12857
20	<p>Affidavits and related documents in Support of Orders Authorizing (1) the Continued Interception of Wire Communications Occurring to and from Mobile Telephone Number (617) 719-8443, Bearing ESN A1000000194102; (2) the Continued Interception of Oral Communications Occurring inside a Starbucks Store located in Somerville, Massachusetts; (3) the Continued Interception of Wire Communications Occurring to and from Mobile Telephone Number (781) 664-3108, Bearing ESN 01502623389; (4) the Continued Interception of Wire Communications Occurring to and from Mobile Telephone Number (617) 645-2213, Bearing ESN 031-1102-6660; and (5) the Continued Interception of Oral Communications Occurring inside a Dunkin' Donuts Store located in Medford, Massachusetts, dated 8/29/09</p>	12858-13047

DX #	Description	Bates Range
21	<p>Affidavits and related documents in Support of Orders Authorizing (1) the Continued Interception of Wire Communications Occurring to and from Mobile Telephone Number (617) 719-8443, Bearing ESN A1000000194102; (2) the Continued Interception of Oral Communications Occurring inside a Starbucks Store located in Somerville, Massachusetts; (3) the Continued Interception of Wire Communications Occurring to and from Mobile Telephone Number (781) 664-3108, Bearing ESN 01502623389; (4) the Continued Interception of Wire Communications Occurring to and from Mobile Telephone Number (617) 645-2213, Bearing ESN 031-1102-6660; and (5) the Continued Interception of Oral Communications Occurring inside a Dunkin' Donuts Store located in Medford, Massachusetts, dated 9/28/09</p>	13048-13282
22	<p>Affidavits and related documents in Support of Orders Authorizing (1) the Continued Interception of Wire Communications Occurring to and from Mobile Telephone Number (617) 719-8443, Bearing ESN A1000000194102; (2) the Continued Interception of Oral Communications Occurring inside a Starbucks Store located in Somerville, Massachusetts; (3) the Continued Interception of Wire Communications Occurring to and from Mobile Telephone Number (781) 664-3108, Bearing ESN 01502623389; (4) the Continued Interception of Wire Communications Occurring to and from Mobile Telephone Number (617) 645-2213, Bearing ESN 031-1102-6660; and (5) the Continued Interception of Oral Communications Occurring inside a Dunkin' Donuts Store located in Medford, Massachusetts, dated 10/29/09</p>	13283-13471

DX #	Description	Bates Range
23	Affidavit and related documents in Support of an Order Authorizing the Interception of Wire Communications Occurring to and from Mobile Telephone Number (501) 690-3677, Bearing ESN 2C336756, dated 12/2/08	13472-13594
24	Affidavit and related documents in Support of an Order Authorizing the Continued Interception of Wire Communications Occurring to and from Mobile Telephone Number (501) 690-3677, Bearing ESN 2C336756, dated 1/5/09	13595-13728
25	Affidavit and related documents in Support of an Order Authorizing the Continued Interception of Wire Communications Occurring to and from Mobile Telephone Number (501) 690-3677, Bearing ESN 2C336756, dated 2/3/09	13729-13877
26	Affidavit and related documents in Support of an Order Authorizing the Interception of Oral Communications Made By, Directed To, or in the Presence of, Ralph F. Deleo in conversation with Various Individuals, Occurring in the District of Massachusetts, dated 5/11/09	13878-13981

**1. Documents Relating to Wiretaps and Electronic Surveillance**

Draft transcripts of wiretap and electronic surveillance recordings will be provided to you if and when they are drafted upon counsels' joint written representation that the draft transcripts may not be used for any purpose including, but not limited to, the cross-examination of any witness and the argument of any motion.

**2. Wiretap Recordings**

**a. Wiretap (617) 719-8443**

Discovery Exhibit 27 consists of six compact discs containing telephone calls and linesheets for this wiretap (Bates numbers 13982-13987).

**b. Wiretap (781) 664-3108**

Discovery Exhibit 28 consists of five compact discs containing telephone calls and linesheets for this wiretap (Bates numbers 13988-13992).

**c. Wiretap (617) 645-2213**

Discovery Exhibit 29 consists of one compact disc containing telephone calls and linesheets for this wiretap (Bates number 13993).

**d. Wiretap (501) 690-3677**

Discovery Exhibit 30 consists of six compact discs containing telephone calls and linesheets for this wiretap (Bates numbers 13994-13999).

**3. Electronic Surveillance Recordings**

**a. Starbucks, Somerville, MA**

Discovery Exhibit 31 consists of seventeen compact discs for this surveillance (Bates numbers 14000-14016).

**b. Dunkin' Donuts, Medford, MA**

Discovery Exhibit 32 consists of four compact discs for this surveillance (Bates numbers 14017-14020).

**c. Roving Surveillance of Ralph F. Deleo**

Discovery Exhibit 33 consists of one compact disc containing surveillance from Starbucks, and one compact disc containing surveillance from Dunkin' Donuts (Bates numbers 14021-14022).

Please contact me if you have any questions or additional requests.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By: /s/  
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